

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA,)	
)	Criminal No. 3:19-cr-19-MHL
v.)	
)	
TROY GEORGE SKINNER,)	
)	
<i>Defendant.</i>)	
)	

STIPULATIONS

COME NOW, the United States of America by its counsel and the defendant, TROY GEORGE SKINNER, by his counsel, and respectfully state that, for the purposes of the hearing and argument as to the defendant's pending pretrial motions, the parties hereby stipulate the following facts are true and correct. The parties are not bound by these stipulations for any future hearings or trial that may occur in this case:

Stipulation No. 1

The parties stipulate that the video files and chat excerpts that have been identified by both parties as exhibits are authentic and admissible without further foundation. The parties reserve the right to argue relevance and weight as either side may deem appropriate.

Stipulation No. 2

The parties stipulate that date and time information incorporated into the video file names and chat excerpts was generated by reliable electronic processes, and acknowledging the ordinary time difference between New Zealand and United States Eastern Time, these dates and times accurately reflect the "on or about" moment the information in the exhibits was created.

Stipulation No. 3

The parties stipulate that consistent with the provisions of 18 U.S.C. § 3509(d)(1)(A)(i) and § 3509(d)(2)(A), the parties' exhibits should all be filed under seal. The parties further stipulate that given the nature of the contents of the exhibits, meaningful redaction of exhibits for the purpose of placing them in the public record is not possible, and the provisions of 18 U.S.C. § 3509(d)(2)(B) are therefore inapplicable.

Respectfully submitted,

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